

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND
NORTHERN DIVISION**

THE UNITED STATES OF AMERICA

v.

ROBERT SWAIN

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Criminal No.: CCB-18-018

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CONSENT MOTION TO MODIFY ORDER SETTING CONDITIONS OF RELEASE

The Defendant, Robert Swain, through counsel, Jonathan P. Van Hoven, hereby requests that the current Order Setting Conditions of Release be modified, and in support of this request, respectfully represents the following:

1. On or about January 17, 2018, this Honorable Court issued an Order Setting Conditions of Release.
2. The Order currently restricts travel to the District of Maryland and to Shrewsbury, Pennsylvania for grocery shopping .
3. Counsel has conferred with U.S. Pretrial Services and has verified that the Defendant has been in full compliance with all conditions of his release.
4. The Defendant is respectfully requesting that the Court modify the conditions of release in order to allow him to travel with his family to Scotrun, Pennsylvania to celebrate the Christmas holiday from December 25-27, 2018, with a schedule to be appropriately set by U.S. Pretrial Services.
5. Counsel has furthermore conferred with Dana Brusca, Esq., who has stated that the Government has no objection to this request.
6. Counsel has also conferred with U.S. Pretrial Services Officer Jessica Weisman, who also has no objection to this request.

WHEREFORE, the Defendant respectfully requests that this Honorable Court:

A. Modify the conditions of release in order to allow for the Defendant to travel as outlined above;

B. Grant such further relief as the nature of this request may require.

Respectfully submitted,
/s/

Jonathan P. Van Hoven
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 18th day of December, 2018, the foregoing Consent Motion To Modify Order Setting Conditions of Release was filed via ECF.

/s/

Jonathan P. Van Hoven